

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

| | | |
|--------------------------|---|------------------------|
| STANLEY FLOREZ, |) | |
| |) | |
| Plaintiff, |) | Case No. 2:24-cv-00019 |
| |) | |
| v. |) | |
| |) | |
| AMAZON.COM SERVICES LLC, |) | |
| |) | |
| Defendant. |) | |
| |) | |

JOINT RULE 26 PLAN

Plaintiff, Stanley Florez (“Plaintiff”), and Defendant, Amazon.com Services, LLC (“Defendant”), by and through their undersigned attorneys, hereby submit the following Rule 26 Plan pursuant to this Court’s order dated March 25, 2024 [Dkt. No. 10]:

I. Nature of the Case

Plaintiff brings claims under the Americans with Disabilities Act of 1990, as amended (“ADA”), for alleged discrimination on the basis of Plaintiff’s disability, and alleged retaliation against Plaintiff for engaging in protected activity. Plaintiff also brings claims under the Family and Medical Leave Act of 1993 (“FMLA”) for Defendant’s alleged retaliation when Plaintiff took FMLA leave.

Defendant denies that it discriminated or retaliated against Plaintiff.

II. Jurisdiction

Jurisdiction is invoked pursuant to 28 U.S.C. § 1331 as claims are brought under both the ADA and the FMLA, two federal statutes.

III. Case Plan

1.Type of Discovery Needed:

- i. Written and oral discovery will be needed, including employment documents and damages-related discovery. The parties agree to electronic service of documents.
- ii. At this time, there are no issues or specific agreements regarding claims of privilege or protection of trial preparation materials, except that the parties anticipate proposing an agreed Confidentiality Order that includes a procedure to assert such claims after production pursuant to Federal Rule of Evidence 502(d). The parties anticipate they will be able to submit a motion for an agreed order.

2. Rule 26(a)(1) Disclosures to be exchanged on or before: **April 12, 2024.**

3. First date by which to issue written discovery will be **April 12, 2024.**

4. Parties will complete Discovery by **October 31, 2024.**

5. At this time, the parties do not anticipate the need for expert discovery.

6. Parties to submit summary judgment motions by **December 31, 2024.**

/s/ Mohammed O. Badwan (with permission)
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Dated: April 5, 2024

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2024, I electronically filed the foregoing **JOINT STATUS REPORT** herein with the Clerk of the United States District Court, Eastern District of Wisconsin, Milwaukee Division, using the CM/ECF system, which sent notification of such filing to the registered CM/ECF participants.

/s/ Stacey L. Smiricky